

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TN

REC'D TO
*00 307 3 PM 12 47

CONSUMER ADVOCATE DIVISION)

v.)

BELLSOUTH TELECOMMUNICATIONS,)
INC.)

DOCKET NO. 00-00041

OFFICE OF THE
EXECUTIVE SECRETARY

MOTION FOR EXTENSION OF TIME TO COMPLETE DISCOVERY

Tennessee consumers move for an extension of time to complete discovery sought by subpoena, depositions or by Tennessee consumers prior Motion to Compel. For cause Tennessee consumers would show:

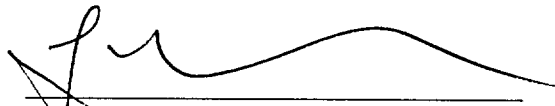
1. That none of the parties to the contracts for purchases of accounts are parties to this proceeding other than BellSouth.
2. That provisions of the contracts for purchases of accounts must be interpreted by the parties to the contract.
3. That Tennessee consumers have obtained subpoenas for the parties to the contracts so that they might be explained.
4. That it is not realistic to believe that parties other than BellSouth can appear and be deposed regarding the contracts before October 10, 2000.
5. That Tennessee consumers have also subpoenaed BellSouth with respect to its proposed tariff.
6. That the agency has not ruled on Tennessee consumers motion to compel and that discovery of the things sought is relevant and material or likely to lead to relevant and material evidence.

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7. That discovery may be stayed pending the Court of Appeals resolution of the Petition for Review filed by Tennessee consumers.

Wherefore Tennessee consumers pray for an extension of time to complete discovery and for other relief as is just.

Respectfully submitted,



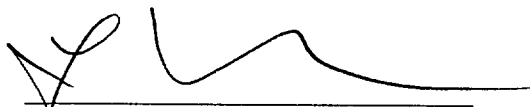
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Certificate of Service

I hereby certify that a true and correct copy of the foregoing Motion to Compel has been mailed postage prepaid to the parties listed below this 3rd day of October, 2000.

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